

Group # 21 CEM-132  
Deidre Benbow

**From:** Shawn Huff  
**Sent:** Tuesday, October 13, 2009 8:34 AM  
**To:** James Rowland; Deidre Benbow  
**Cc:** Doug Hensel  
**Subject:** FW: Grey water standards - Potential Fatal Flaw

Dee,

Mr. Chan appears has made another public comment (recommendation). Would you please log this comment and distribute it as necessary.

Thanks,

Shawn

EM-132

**From:** Chan, Victor M. [mailto:VMChan@SolanoCounty.com]  
**Sent:** Friday, October 09, 2009 9:34 AM  
**To:** Shawn Huff  
**Cc:** Mail Administrator  
**Subject:** Grey water standards - Potential Fatal Flaw

Shawn Huff Please forward this email to Jim Rolland since I don't have his email address. Vic

Jim

It was a pleasure talking to you a few days ago.

Recently, a new issue developed at Solano County involving the proposed Grey Water Standards which I strongly support.

I don't see a requirement to use Phosphate free, biodegradable soap and detergent by the owners of gray water systems.

This may be necessary to avoid unwanted algae growth and soapy bubbles in our nearby lakes and streams.

Soap tends to float and normally is removed as floating scum in a typical septic tank or a typical waste water treatment process.

A gray water system may not have this removal process and therefore the discharge is more similar to a grey water discharge at a camping site.

However, most responsible campers use biodegradable soap to protect the environment and I don't see any similar protection in a gray water system.

I am concerned that the gray water systems may be considered a violation of the federal CWA if unwanted algae growth and soapy bubbles are later found to be connected to the gray water discharge.

Therefore I recommend that HCD consider making "Phosphate free, biodegradable soap and detergent" a requirement or at least a strong recommendation in the use of grey water systems.

Thank you in advance for your full consideration of this potential problem.

Victor M Chan, PE, BCEE  
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